

LAW OFFICES
BLACK McLAREN JONES RYLAND & GRIFFEE
A PROFESSIONAL CORPORATION
530 OAK COURT DRIVE, SUITE 360
MEMPHIS, TENNESSEE 38117
TELEPHONE 901-762-0535
TELECOPIER 901-762-0539

CHARLES S. MITCHELL:
CMITCHELL@BLACKMCLAW.COM

FIRM WEBSITE:
WWW.BMJRGLAW.COM

April 19, 2019

Mr. Jason R. Knutson
Trial Attorney
U.S. Department of Justice
Criminal Division / Fraud Section

RE: *United States v. Dr. Richard Farmer*
No: 2:19-cr-20075-TLP
My File No. 6532.001

Dear Mr. Knutson:

1. Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Defendant hereby requests copies of all items discoverable under subparagraphs (a)(1)(A) through (a)(1)(E).

2. The Defendant further requests notice of the government's intention to use any like and similar conduct on the part of the defendant should this case proceed to trial.

3. The Defendant requests notice of any items seized by agents of the United States from the person or residence of the Defendant, which may or could be the subject of a Motion to Suppress Evidence as per Rule 12(d)(2).

4. The Defendant further requests notice of the use of any electronic surveillance or wiretap in this case.

5. This discovery request includes the production of information contained in the files or otherwise known to any municipal or state agency, whether civil, administrative, or criminal in nature, which information has formed part of the decision to prosecute.

6. This letter also requests the disclosure by the government of "Brady" material including impeachment evidence as set out in the case of United States v. Bagley, 87 L.Ed.2d 481 (1985). Consequently, the defendant is hereby requesting any information the government may have that is favorable to the defendant and material either to guilt or punishment, including evidence going to the impeachment of a government witness, and specifically includes information about the possible interest of a witness in testifying falsely.

7. The existence, substance, extent, and the manner of execution or fulfillment of any inducement, promise, statement, agreement, understanding, or arrangement, either verbal, written, or implied, between the government and any agents and any prosecution witness, or his or her attorneys or representatives, for the purpose of obtaining said person's testimony, cooperation, or provision of

Mr. Jason R. Knutson
April 19, 2018
Page 2

information to the government wherein the government has agreed stated, or implied action as to any of the following;

- (a) Not to prosecute said person for any crime or crimes, charged or uncharged.
- (b) To provide a formal grant of statutory immunity, or to provide an informal assurance that the person will not be prosecuted in connection with any testimony, cooperation, or information given.
- (c) To recommend leniency or a particular sentence for any crime or crimes for which he or she stands convicted or for which he or she will be charged or is expected to be convicted.
- (d) To reconsider or otherwise alter its present position towards sentence, prosecution, or other exposure based upon the nature and extent of the person's future testimony or cooperation relative to this or any other case.
- (e) To make any recommendation of benefit to the person or any state or federal agency.
- (f) To provide favorable treatment or consideration, that is, money, job, a new location, etc., to the person himself or to friends or relatives of the person in return for his testimony, cooperation, or provision of information.
- (g) Not to prosecute a third party for any crime or crimes where the reason for not prosecuting said third party is the consideration to the person or witness.
- (h) To make any other recommendations of benefit or to give any other consideration to the person or friends or relatives of said person.

In closing, I would also request notification and a description of any information that would qualify as "relevant conduct" under the United States Sentencing Guidelines. Thank you.

Sincerely,

s/Charles S. Mitchell
Charles S. Mitchell

CSM/clw
cc: U.S. District Court Clerk